



DOUGLAS COUNTY SHERIFF'S OFFICE

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JOHN H. PARDON
SHERIFF

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January 25, 1993

FEDERAL COMMUNICATIONS COMMISSION
Gettysburg, Pennsylvania 17326

RECEIVED

FEB 18 1993

Re: FCC PR Docket #92-235 - Replacement of part 90 of Part 88 to rev ~~FEDERAL COMMUNICATIONS COMMISSION~~
Private Land Mobile Radio Service and to modify the policies governing ~~OFFICE OF THE SECRETARY~~

Douglas County Sheriff's Office is part of the Douglas County 9-1-1 Emergency Telephone Jurisdiction and Consolidated Communications System. Douglas County Emergency Communications receives the 9-1-1 emergency calls for service in our jurisdiction then notifies our mobile units by VHF radio.

All police agencies in Douglas County use the same frequencies in the police radio service. The system is voted-simulcast VHF system which covers the county with four (4) repeater sites. The county has approximately 90% coverage of our land with this system. The transmitters are at 110 watts of out-put power at this time in order to be able to reach large land area we have in this county (5200 square miles). The distance transmission problems are compounded by the topography of this county which is very mountainous and includes a great many valleys (1000+).

The proposed rule changes, that would limit maximum authorized effective radiated power, with respect to antenna height above the average terrain would be unacceptable in our area. It would result in Douglas County Emergency Communications having to reduce transmitter out-put power to five (5) watts at most of the radio sites.

If they were required to do that, our law enforcement radio system would no longer be able to receive radio traffic in most of the areas. To develop and purchase a system to give us the same coverage for the county would be cost prohibitive. I don't think that the Pacific Northwest was considered when the proposal was made, as our part of the country cannot accommodate this kind of a rule.

The proposed rule changes would be devastating to public safety in the suburban and rural areas like Douglas County. The Douglas County Sheriff's Office is protesting these proposed rule changes and would like to see some exceptions made in the Pacific Northwest and, in particular, the rural areas of southern Oregon.

I thank you for taking the time to consider our viewpoint in this matter and I am awaiting a decision in the near future.

Sincerely,

[REDACTED]